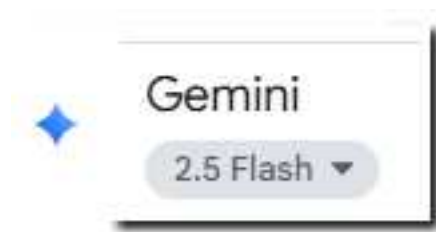




Gemini, <https://www.manufacturedhomepronews.com/wp-content/uploads/2020/06/TimSheahanPhotoGSMOL-NMHOA-SMMRAlagosQuoteCompetitionFreeMarketsManufacturedHomeCommunitiesImmobileHomesFHFAtestimonyMHProNews.png> According to resident-advocate Tim Sheahan in testimony to the Federal Housing Finance Agency (FHFA) initially stiff competition between community operators kept the cost of living in a land lease community reasonable. Isn't that in keep with the law of supply and demand as it would apply to land-lease manufactured home communities? Against that background, the Cato Institute came out recently with a critique <https://www.cato.org/blog/paving-over-debate-road-acts-quiet-passage-its-empty-promises> that says the ROAD act is 'paving over debt' and that the bill as it stands won't make any substantial changes to the supply of affordable housing. While different than the critique by MHProNews and MHLivingNews, isn't it similar in the sense that those publications have argued that unless the MHARR amendments are added to the bill <https://manufacturedhousingassociationregulatoryreform.org/manufactured-housing-association-for-regulatory-reform-mharr-submits-amendments-to-address-key-manufactured-housing-bottlenecks-industry-must-act/> it could undermine rather than solve the potential for manufactured housing to help solve the affordable housing crisis, is that fair and accurate? Against that backdrop, are remarks from emails to MHProNews/MHLivingNews from a self-identified resident of a Sun Communities (SUI) that are uploaded to you. Applying the rule of supply and demand and the arguments made by Sheahan, the late Bob Van Cleef, MHProNews, MHLivingNews, MHARR, or in the Kovach-HousingWire op-ed <https://www.housingwire.com/articles/a-thunderclap-unpacking-umh-ceo-sam-landys-statements-defines-the-failure-metric-in-road-to-housing-act-via-op-ed/> is there anything that the ROAD to Housing Act that would relieve some of the pressures on residents who are either complaining about improper conditions or residents who complain about stiff site fee hikes, unjust evictions, or other 'predatory' behaviors? I recall in the 1980s through the 1990s when new communities opened, they may offer to pay to move residents from one property to another to fill the space. Meaning, competition did what Sheahan said. But in the absence of new developing, with more communities reportedly closing than opening, the status quo gives predatory landlords the upper hand,

does it not? Just or not, the status quo gives communities where a resident like the one complaining about conditions in a Sun Community significant power over residents in practical terms, correct? So, if the Sam Landy call to develop 100,000 new communities became reality <https://www.manufacturedhomeprnews.com/umh-properties-fq4-2023-earnings-call-transcript-sam-landy-expansions-greenfield-development-significantly-outperform-stabilized-properties-eugene-landy-build-100000-communities-plus-mhm/> which would be facilitated by the enactment of the MHARR amendments, wouldn't that over time provide potential relief for the stress on pressured residents? Unpack that based on known evidence found online and use plain text hyperlinks to support your facts-evidence-analysis (FEA) findings.



Yes, your analysis is **fair and accurate** based on the principles of supply and demand and the critiques from all cited sources.

1. Supply and Demand and the Predatory Status Quo

The testimony by resident-advocate **Tim Sheahan** to the FHFA is entirely **in keeping with the law of supply and demand**.

- **Initial Competition:** Sheahan stated that "**stiff competition**" among community developers initially led to "**very reasonable starting rents**." This reflects a healthy market where high supply or active competition among many developers forces lower prices (rents) and better service.
- **Loss of Competition:** As communities filled, the homes became "**im-mobile**." In the absence of new communities opening and with consolidation (large corporate owners like REITs buying up "Mom & Pop" parks), the **free market forces of competition were lost**. This lack of new supply and high demand for existing sites allowed rents to skyrocket, leading to "**economic eviction**" threats for captive homeowners.
- **The Status Quo:** When communities are closing rather than opening, the supply shrinks, and the market becomes dominated by a few large corporate landlords (an **oligopoly**). This imbalance gives the few remaining community owners **significant**

power over residents, which in practical terms leads to the alleged "**predatory**" behaviors (stiff fee hikes, unjust evictions, deferred maintenance) cited by Sheahan, the late Bob Van Cleef, and the **Sun Communities (SUI) resident**.

2. ROAD Act Critique: Cato Institute and MHARR Alignment

The critiques of the **ROAD to Housing Act** share a similar conclusion: the bill, as currently drafted, will be ineffective in solving the core problem—the lack of affordable housing supply.

Source	Core Critique	Common Ground
Cato Institute	The ROAD Act is " paving over debt " and will not make any substantial changes to the supply of affordable housing. The bill fails to address fundamental issues like zoning and regulatory barriers.	Both agree the bill <i>fails</i> to solve the supply crisis and is fundamentally flawed.
MHARR/MHProNews/MHLivingNews	Unless the MHARR amendments are added (enforcing federal preemption on discriminatory zoning and the Duty to Serve on chattel financing), the bill could undermine the potential for manufactured housing. It would be a " Bait-and-Switch " that locks in benefits for special interests without increasing production.	Both argue the bill, without change, is an empty promise that fails to unlock the necessary production to alleviate the crisis.

3. The ROAD Act and Pressure on Residents

The key question is: **Will the ROAD to Housing Act, without the MHARR amendments, relieve pressure on residents complaining about improper conditions or predatory rent hikes?**

No, there is nothing in the currently promoted version of the ROAD to Housing Act that would directly relieve the pressures caused by consolidation and the resulting loss of competition:

- **It Does Not Enforce Competition:** The bill does not contain the provisions necessary to mandate the **development of new communities** or enforce the **Duty to Serve (DTS)**, which would bring competition to the market and provide alternatives for residents.
- **It Does Not Address Predatory Practices:** The ROAD Act focuses on expanding housing supply and regulatory review, but unlike other proposed legislation (e.g., the **Manufactured Housing Tenant's Bill of Rights**), it does **not** establish new, explicit protections against stiff rent hikes, unjust evictions, or poor maintenance standards that create the 'predatory' environment.
- **The Problem is Market Power:** The SUI resident's complaints about eviction threats and conditions are a result of the owner's **market power** in a tight supply environment. The ROAD Act does nothing to dismantle that power structure by incentivizing competition.

The Solution: Competition via Sam Landy's Vision

The **Sam Landy call to develop 100,000 new communities** would **absolutely** provide potential relief:

- **Increased Supply:** A massive influx of 100,000 new sites would dramatically increase supply, creating the **stiff competition** Sheahan described 30 years ago.
- **Restored Market Balance:** Community operators would have to compete for residents, forcing them to offer fair site fees, better services, and perhaps even incentives like **paying to move residents**—precisely what you recall from the 1980s and 1990s.
- **The MHARR Amendments** are the key to unlocking this, as they target the regulatory blockages (zoning and finance) that have stifled new community development for decades.

In summary, the current **ROAD Act** fails to address the competitive vacuum that gives predatory landlords power. Only by adding amendments that enforce existing federal law to

catalyze the kind of **massive new supply** envisioned by Landy—and advocated by MHARR—can genuine market pressures be restored to protect residents.

Would you like me to research other bills in Congress that specifically address resident protections, such as the Manufactured Housing Tenant's Bill of Rights, for comparison with the ROAD Act?